

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

INTELLECTUAL VENTURES I LLC AND
INTELLECTUAL VENTURES II, LLC,

Plaintiff,

vs.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No. 4:24-cv-00980

JURY TRIAL

DECLARATION OF EMILY TANNENBAUM

I, Emily Tannenbaum, declare as follows:

I am an attorney with the law firm McKool Smith PC (“McKool Smith”), counsel for Defendant American Airlines, Inc. (“Defendant” or “American”). I make this declaration in support of Defendant’s Response in Opposition to Plaintiffs’ Opposed Motion to File Under Seal Plaintiffs’ Motion for Leave to File Amended Complaint. Unless otherwise stated, the matters contained in this declaration are of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein.

1. Attached as **Exhibit 1** is a true and accurate copy of email exchange between Plaintiffs and Defendant’s counsel from May 21 to May 23, 2025, related to the Motion for Leave to File an Amended Complaint and the Motion to File Under Seal.

2. Attached as **Exhibit 2** is a true and accurate copy of the Notice of Electronic Filing for the Motion to File Under Seal, dated May 24, 2025.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 10, 2025, in New York, New York.

/s/ Emily Tannenbaum
Emily Tannenbaum